

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MICHAEL DESANTO,
Plaintiff,

v.

IKEA NORTH AMERICAN
SERVICES, LLC
Defendant.

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Civil Action
No. 21-1533-JHS

DEFENDANT’S PARTIAL MOTION TO DISMISS PLAINTIFF’S COMPLAINT

Defendant IKEA North America Services, LLC (incorrectly named IKEA North American Services, LLC) (hereinafter “Defendant” or “IKEA”), by its undersigned attorneys, respectfully moves this Court for an Order dismissing Count I (Violation of Title VII of the Civil Rights Act of 1964) and Count II (Violations of the Age Discrimination in Employment Act) of Plaintiff Michael DeSanto’s Complaint with prejudice for failure to state a claim upon which relief can be granted under Rule 12(b)(6) of the Federal Rules of Civil Procedure. Defendant incorporates the attached Brief in Support of Defendant’s Partial Motion to Dismiss as if fully set forth herein. If this Motion is opposed, oral argument is requested. A proposed Order granting the requested relief accompanies this Motion.

Respectfully submitted,

/s/ Robert C. Perryman

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Dated: June 1, 2021

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